

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ELECTRONIC SCRIPTING PRODUCTS, INC.,

Plaintiff,

v.

AMP CREATIVE,

Defendant.

Civil Action No.

COMPLAINT FOR PATENT  
INFRINGEMENT

JURY DEMAND

**1. COMPLAINT FOR PATENT INFRINGEMENT**

2. COMES NOW, Plaintiff ELECTRONIC SCRIPTING PRODUCTS, INC. (“ESPi”) or its Complaint against Defendant AMP CREATIVE (“AMP CREATIVE”), alleges as follows:

**THE PARTIES**

1. Plaintiff Electronic Scripting Products, Inc. (“ESPi”) is a company organized under the laws of the State of Delaware, having its principal place of business located at 446 Old

1 County Road, Suite 201, Pacifica, CA 94044 and mailing address at 555 Bryant Street #142, Palo  
2 Alto, CA 95301.

3 2. On information and belief, AMP CREATIVE (“AMP CREATIVE”) is a  
4 corporation with an office in Seattle, Washington.

### 5 JURISDICTION AND VENUE

6 3. This is an action for patent infringement in violation of the Patent Act of the  
7 United States, 35 U.S.C. §§ 1 *et seq.*

8 4. This Court has original and exclusive subject matter jurisdiction over the patent  
9 infringement claims for relief under 28 U.S.C. §§ 1331 and 1338(a).

10 5. This Court has personal jurisdiction over AMP CREATIVE because it maintains  
11 a regular and established place of business in this District. On information and belief, AMP  
12 CREATIVE has transacted and is continuing to transact business in this District that includes,  
13 but is not limited to, committing acts of patent infringement giving rise to this action by use and  
14 sale of products and systems that practice the subject matter claimed in the patent involved in  
15 this action.

16 6. Venue is proper in this district under 28 U.S.C. § 1400(b) because AMP  
17 CREATIVE has a regular and established place of business in this District. Upon information  
18 and belief, AMP CREATIVE has committed acts of infringement in this district.

### 19 FACTS

20 7. On January 29, 2019, United States Patent No. 10,191,559 B2 entitled “Computer  
21 Interface For Manipulated Objects With An Absolute Pose Detection Component” was duly and  
22 legally issued. A true and correct copy of United States Patent No. 10,191,559 B2 (“the ’559  
23 Patent”) is attached hereto as Exhibit A and incorporated herein by this reference.

24 8. Plaintiff is the assignee of the entire right, title and interest in and to the ’559  
25 Patent, including all rights to enforce the ’559 Patent and to recover for infringement.

26 9. Claim 1 of the ’559 Patent claims:

1           1. A manipulated object cooperating with a first plurality of high optical contrast  
2 features disposed in a real three-dimensional environment, said manipulated object  
3 comprising:

4           a) a photodetector configured to detect said first plurality of high optical contrast  
5 features and generate photodetector data representative of the positions of said first  
6 plurality of high optical contrast features;

7           b) a controller configured to identify a derivative pattern of said first plurality of  
8 high optical contrast features from said photodetector data, wherein said derivative  
9 pattern is indicative of the position of said photodetector; and

10          c) at least one component selected from the group consisting of an auxiliary  
11 motion detection component, an active illumination component and a scanning  
12 component.

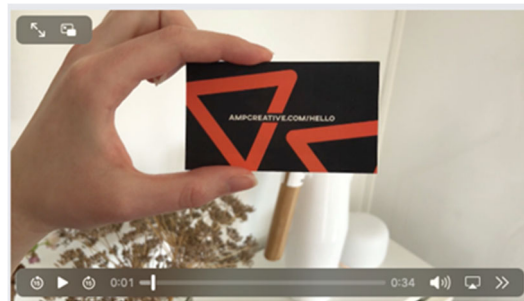
13  
14 On information and belief, AMP CREATIVE infringes Claim 1 of the '559 Patent by making,  
15 using, selling and/or offering to sell in the United States, including in this District, through its  
16 AR/VR solutions and associated software and products ("Accused Products").

17           10. AMP CREATIVE infringes each element of Claim 1 as follows:

18           "A manipulated object cooperating with a first plurality of high optical contrast  
19 features disposed in a real three-dimensional environment, said manipulated object  
20 comprising:" – To the extent that the preamble is included in an infringement analysis,  
21 below demonstrates the various elements -- AMP CREATIVE uses as manipulated object  
22 a mobile device such as an iOS devie or an Android devie.  
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The device cooperates with high contrast features in the real three-dimensional environment, e.g., edges of the table or special markings such as those used in commerce on business cards:



In cases where AMP CREATIVE uses an iPhone the Apple ARKit or equivalent looks for features:

scene visible to the device's camera. ARKit recognizes notable features in the scene image, tracks differences in the positions of those features across video frames, and compares that information with motion sensing data. The result is a high-precision model of the device's position and motion.

In cases where AMP CREATIVE uses an Android phone, the Google ARCore or equivalent looks for features:

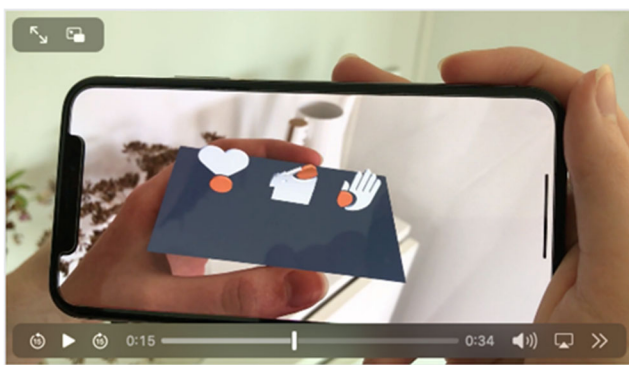
ARCore is constantly improving its understanding of the real world environment by detecting feature points and planes.

“a) a photodetector configured to detect said first plurality of high optical contrast features and generate photodetector data representative of the positions of said first

1 plurality of high optical contrast features;” – AMP CREATIVE uses a camera of an  
2 iOS device or Android device as the photodetector to detect the high optical contrast  
3 features and generate data representative of the positions of these features:



10  
11 “b) a controller configured to identify a derivative pattern of said first plurality of  
12 high optical contrast features from said photodetector data, wherein said derivative  
13 pattern is indicative of the position of said photodetector; and” – AMP CREATIVE  
14 uses the iPhone or Android phone processing unit(s) as controller(s) that identify the  
15 derivative pattern and this derivative pattern is indicative of the position of the  
16 photodetector here by the phone’s camera:



24 “c) at least one component selected from the group consisting of an auxiliary  
25 motion detection component, an active illumination component and a scanning  
26 component.” – AMP CREATIVE uses at least one of the iOS device’s or Android  
27

1            devie's auxiliary motion detection components such as inertial device (Inertial  
2            Measurement Unit or IMU or motion sensing unit), using the Apple ARKit, Google  
3            ARCore.

4            11.      Similarly, AMP CREATIVE also infringes Claims 6, 6, 10, 15, 16, 19, 24, and  
5            25.

6            12.      On November 2, 2010, United States Patent No. 7,826,641 B2 entitled "Apparatus  
7            And Method For Determining An Absolute Pose Of A Manipulated Object In A Real Three-  
8            Dimensional Environment With Invariant Features" was duly and legally issued. A true and  
9            correct copy of United States Patent No. 7,826,641 B2 ("the '641 Patent") is attached hereto as  
10           Exhibit B and incorporated herein by this reference.

11           13.      Plaintiff is the assignee of the entire right, title and interest in and to the '641  
12           Patent, including all rights to enforce the '641 Patent and to recover for infringement.

13           14.      Claim 1 of the '641 Patent claims:

14           1. An apparatus for processing absolute pose data derived from an absolute pose  
15           of a manipulated object in a real three-dimensional environment, said apparatus  
16           comprising:

17           a) at least one invariant feature in said real three-dimensional environment;

18           b) an optical measuring means for optically inferring said absolute pose from on-  
19           board said manipulated object using said at least one invariant feature and expressing  
20           said inferred absolute pose with absolute pose data ( $\phi$ ,  $\theta$ ,  $\psi$ ,  $x$ ,  $y$ ,  $z$ ) representing Euler  
21           rotated object coordinates expressed in world coordinates ( $X_o$ ,  $Y_o$ ,  $Z_o$ ) with respect to  
22           a reference location;

23           c) a processor for preparing said absolute pose data and identifying a subset of  
24           said absolute pose data; and

25           d) a communication link for transmitting said subset to an application.

1           15.     On information and belief, AMP CREATIVE infringes Claim 1 of the '641 Patent  
2 by making, using, selling and/or offering to sell in the United States, including in this District,  
3 through its AR/VR solutions and associated software and products ("Accused Products").

4           16.     AMP CREATIVE infringes each element of Claim 1 as follows:

5                 "An apparatus for processing absolute pose data derived from an absolute pose of  
6 a manipulated object in a real three-dimensional environment, said apparatus  
7 comprising:" – To the extent that the preamble is included in an infringement analysis,  
8 below demonstrates the various elements: AMP CREATIVE has an apparatus for  
9 processing absolute pose data derived from an absolute pose of a manipulated object that  
10 is a mobile device such as an iOS (e.g., iPad/iPhone) or an Android device:



21                 "a) at least one invariant feature in said real three-dimensional environment;"  
22 – AMP CREATIVE uses at least one invariant feature in the real three-  
23 dimensional environment that can include special markings such as those used in  
24 commerce on business cards:





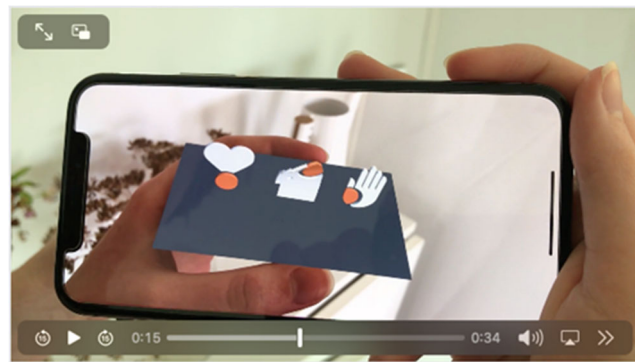
“b) an optical measuring means for optically inferring said absolute pose from on-board said manipulated object using said at least one invariant feature and expressing said inferred absolute pose with absolute pose data ( $\phi$ ,  $\theta$ ,  $\psi$ ,  $x$ ,  $y$ ,  $z$ ) representing Euler rotated object coordinates expressed in world coordinates ( $X_o$ ,  $Y_o$ ,  $Z_o$ ) with respect to a reference location;” – AMP CREATIVE uses a camera of iPhone or Android phone as the optical measuring means for optically inferring said absolute pose from onboard an iPhone or an Android phone:



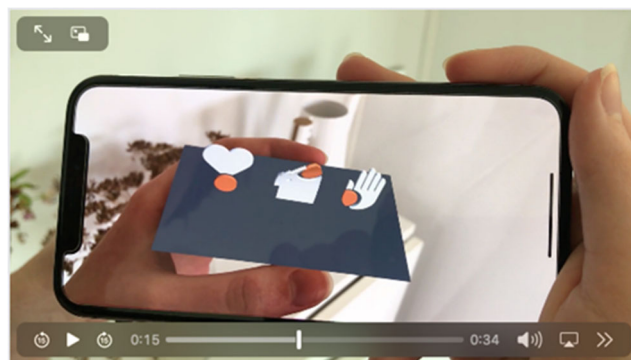


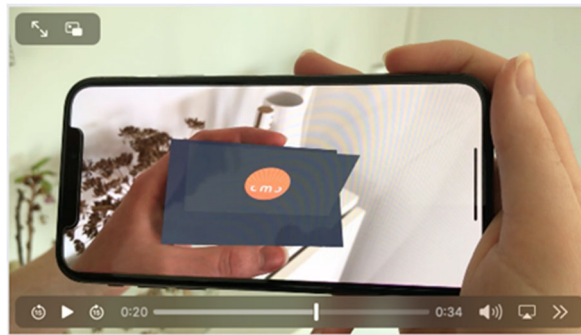
Further, it uses the at least one invariant feature and expressing the absolute pose data by rotation angles (pitch, yaw, roll) expressing the orientation and (x,y,z) expressing the position portions of the absolute pose with respect to a reference location.

“c) a processor for preparing said absolute pose data and identifying a subset of said absolute pose data; and” – AMP CREATIVE uses an iOS device’s or an Android device’s processing unit(s) as controller(s) for preparing the absolute pose data and identifying a subset of the absolute pose data where the subset can include all the pose data.



“d) a communication link for transmitting said subset to an application” – AMP CREATIVE uses a communication link internal to the manipulated object such as an iPhone or an Android phone for transmitting the subset to an application, e.g., an application for seeing an item from every angle:





17. Similarly, AMP CREATIVE also infringes Claim 29.

18. On January 5, 2016, United States Patent No. 9,229,540 B2 entitled “Deriving Input From Six Degrees Of Freedom Interfaces” was duly and legally issued. A true and correct copy of United States Patent No. 9,229,540 B2 (“the ’540 Patent”) is attached hereto as Exhibit C and incorporated herein by this reference.

19. Plaintiff is the assignee of the entire right, title and interest in and to the ’540 Patent, including all rights to enforce the ’540 Patent and to recover for infringement.

20. Claim 1 of the ’540 Patent claims:

1. An interface for producing an input from an absolute pose of an item associated with a user in a three-dimensional environment, said interface comprising:

a) a unit on-board said item, said unit configured to receive non-collinear optical inputs presented by at least one stationary object in said three-dimensional environment, said at least one stationary object having at least one feature detectable via an electromagnetic radiation, said at least one feature presenting a sufficient number of said non-collinear optical inputs for establishing a stable frame in said three-dimensional environment;

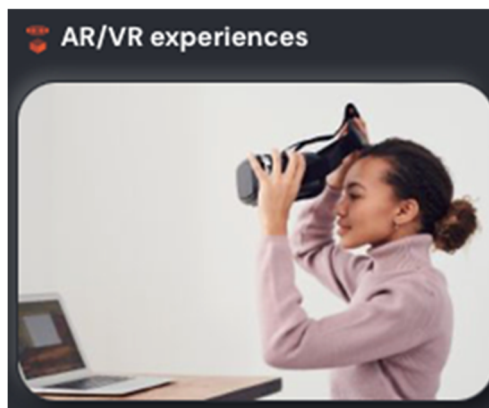
b) processing electronics employing a computer vision algorithm using a homography to recover said absolute pose of said item from a geometrical description of said non-collinear optical inputs in terms of absolute pose parameters in said stable frame and to generate a signal related to at least one of said absolute pose parameters;

1 c) an application employing said signal in said input, wherein said absolute pose  
2 of said item comprises at least three translational degrees of freedom and at least three  
3 rotational degrees of freedom, said at least one absolute pose parameter is related to at  
4 least one among said at least three translational degrees of freedom and said at least  
5 three rotational degrees of freedom by a mapping and at least one aspect of said  
6 application varies with said absolute pose of said item.

7 21. On information and belief, AMP CREATIVE infringes Claim 1 of the '540 Patent  
8 by making, using, selling and/or offering to sell in the United States, including in this District,  
9 through its AR/VR solutions and associated software and products ("Accused Products").

10 22. AMP CREATIVE infringes each element of Claim 1 as follows:

11 "An interface for producing an input from an absolute pose of an item associated  
12 with a user in a three-dimensional environment, said interface comprising:" – To the  
13 extent that the preamble is included in the infringement analysis, AMP CREATIVE has  
14 an interface such as WebXR for producing an input from an absolute pose of an item that  
15 is a wearable item, namely a VR headset (HDM) that is associated with a user in a three-  
16 dimensional environment, as shown below:





“a) a unit on-board said item, said unit configured to receive non-collinear optical inputs presented by at least one stationary object in said three-dimensional environment, said at least one stationary object having at least one feature detectable via an electromagnetic radiation, said at least one feature presenting a sufficient number of said non-collinear optical inputs for establishing a stable frame in said three-dimensional environment” -- AMP CREATIVE uses a unit on-board the item (i.e., a unit on-board the HMD), this unit are the on-board cameras (e.g., dual front-facing cameras) that receive non-collinear optical inputs. The non-collinear optical inputs are presented by at least one stationary object in the three-dimensional environment, in other words, in uses a tracked environment that "lock" virtual content to the physical location in the three-dimensional environment. The at least one stationary object having at least one feature detectable via an electromagnetic radiation and having sufficient number of non-collinear optical inputs for establishing a stable frame in the three-dimensional environment, here AMP Creative uses stationary objects in room such as furniture and other objects and the stable frame is obtained from frames at framerate of cameras in XR hardware device. CREATIVE uses electromagnetic radiation, since the HMD cameras use electromagnetic radiation.



“b) processing electronics employing a computer vision algorithm using a homography to recover said absolute pose of said item from a geometrical description of said non-collinear optical inputs in terms of absolute pose parameters in said stable frame and to generate a signal related to at least one of said absolute pose parameters” -- AMP CREATIVE uses electronics employing a computer vision algorithm using a homography (homography aka projective or perspective transformation) to recover the absolute pose of the item or HMD or XRViewer perspective from a geometrical description of the non-collinear optical inputs in terms of absolute pose parameters in the stable frame, which is the XRReferenceSpace - i.e., the geometrical description using coordinates and to generate a signal related to at least one of the absolute pose parameters.

Here signal is related to position and orientation (full pose) or all absolute pose parameters.

“c) an application employing said signal in said input, wherein said absolute pose of said item comprises at least three translational degrees of freedom and at least three rotational degrees of freedom, said at least one absolute pose parameter is related to at least one among said at least three translational degrees of freedom and said at least three rotational degrees of freedom by a mapping and at least one aspect of said application

varies with said absolute pose of said item.” -- AMP CREATIVE uses an application employing the signal (all absolute pose parameters) of the item (VR headset or HMD) including at least three translational degrees of freedom and at least three rotational degrees of freedom.



And they map all the degrees of freedom to at least one aspect of the application, such as navigating in three-dimensional space in their VR application to navigate a virtual scene.

23. Similarly, AMP CREATIVE infringes Claims 2, 11-19, 25, 32, 33, 34, 36, 37, 39, 40, and 44-49 of the ‘540 Patent.

### **FIRST CLAIM FOR RELIEF**

#### **(Direct Infringement of the ‘559 in Violation of 35 U.S.C. § 271(a))**

24. ESPi refers to and incorporates herein by reference paragraphs 1-23.

25. The ‘559 Patent is valid and enforceable.

1           26.     AMP CREATIVE has infringed and continues to infringe at least Claims 1, 6, 7,  
2     10, 15, 16, 19, 24, and 25 of the '559 Patent under 35 U.S.C. 271(a), either literally or under the  
3     Doctrine of Equivalents, by making, using, selling or offering to sell the Accused Products.

4           27.     AMP CREATIVE has had knowledge and notice of the '559, as well as of its own  
5     infringement of the '559, since at least the date of the filing of this Complaint.

6           28.     ESPi has been and continues to be damaged by AMP CREATIVE's infringement  
7     of the '559.

8           29.     AMP CREATIVE's infringement of the '559 has been and continues to be  
9     willful.

10  
11                                   **SECOND CLAIM FOR RELIEF**

12                   **(Inducing Infringement of the '559 Patent, in Violation of 35 U.S.C. § 271(b))**

13           30.     ESPi refers to and incorporates herein by reference paragraphs 1-29..

14           31.     AMP CREATIVE is also liable for indirect infringement under 35 U.S.C.  
15     §271(b), because AMP CREATIVE knowingly induced and continues to induce the direct  
16     infringement of one or more of the Claims by end-users and other third parties (i.e. wholesalers,  
17     retailers, entertainment operators, e-sports venues and arcade operators) in the United States.

18           32.     Said-users and other third parties have directly infringed at least Claims 1, 10 and  
19     19 of the '559 Patent by using or operating the Accused Products, in the manner for which such  
20     Accused Products were and are designed and marketed; that is when the Accused Products are  
21     used as AMP CREATIVE intends them to be used, the user and the act of usage thereof  
22     necessarily directly infringe the '559 Patent.

23           33.     AMP CREATIVE knowingly took active steps to induce end-users and other third  
24     parties in the United States to engage in direct infringement of the '559 Patent since AMP  
25     CREATIVE knew that when the Accused Products are used for their intended purpose by third  
26     parties and end users, such third parties and users directly infringe the claims of the '559 Patent.



1 For example, to induce such third parties' and users' infringement, AMP CREATIVE, on  
2 information and belief, provided, sold, or promoted the Accused Products to end-users or other  
3 third parties along with specific instructions or training regarding the use of those products,  
4 which instructions or training actively induced said end-users and other third parties to practice  
5 one or more of the Claims and said instructions or training caused direct infringement of such  
6 Claims.

7 34. AMP CREATIVE possessed the specific intent to induce direct infringement of  
8 the Claims by end-users and other third parties which intent was manifested, inter alia, by its  
9 instructions and/or training for using the Accused Products to end users and third parties, and  
10 sale of the Accused Products to end users and third parties, and its knowledge of the '559 Patent  
11 and its knowledge that any use of the Accused Products by end-users and other third parties  
12 would necessarily directly infringe one or more of the claims of the '559 Patent.

13 35. AMP CREATIVE knew or should have known that testing, demonstrating,  
14 marketing, making, using, offering to sell, selling, and/or importing the Accused Products  
15 constituted infringement of one or more of the claims of the '559 Patent, based on, among other  
16 things, the reasons alleged in the foregoing paragraph.

17 36. By reason of the acts of AMP CREATIVE alleged herein, ESPi has suffered  
18 damage in an amount to be proved at trial.

### 19 **THIRD CLAIM FOR RELIEF**

#### 20 **(Direct Infringement of the '641 in Violation of 35 U.S.C. § 271(a))**

21 37. ESPi refers to and incorporates herein by reference paragraphs 1-36..

22 38. The '641 Patent is valid and enforceable.

23 39. AMP CREATIVE has infringed and continues to infringe at least Claims 1 and 29  
24 of the '641 Patent under 35 U.S.C. 271(a), either literally or under the Doctrine of Equivalents,  
25 by making, using, selling or offering to sell the Accused Products.  
26

1           40.     AMP CREATIVE has had knowledge and notice of the '641, as well as of its own  
2 infringement of the '641, since at least the date of the filing of this Complaint.

3           41.     ESPi has been and continues to be damaged by AMP CREATIVE's infringement  
4 of the '641.

5           42.     AMP CREATIVE's infringement of the '641 has been and continues to be  
6 willful.

7                                   **FOURTH CLAIM FOR RELIEF**

8                   **(Inducing Infringement of the '641 Patent, in Violation of 35 U.S.C. § 271(b))**

9           43.     ESPi refers to and incorporates herein by reference paragraphs 1-34.

10          44.     AMP CREATIVE is also liable for indirect infringement under 35 U.S.C.  
11 §271(b), because AMP CREATIVE knowingly induced and continues to induce the direct  
12 infringement of one or more of the Claims by end-users and other third parties (i.e. wholesalers,  
13 retailers, entertainment operators, e-sports venues and arcade operators) in the United States.

14          45.     Said-users and other third parties have directly infringed at least Claims 1 and 29  
15 of the '641 Patent by using or operating the Accused Products, in the manner for which such  
16 Accused Products were and are designed and marketed; that is when the Accused Products are  
17 used as AMP CREATIVE intends them to be used, the user and the act of usage thereof  
18 necessarily directly infringe the '641 Patent.

19          46.     AMP CREATIVE knowingly took active steps to induce end-users and other third  
20 parties in the United States to engage in direct infringement of the '641 Patent since AMP  
21 CREATIVE knew that when the Accused Products are used for their intended purpose by third  
22 parties and end users, such third parties and users directly infringe the claims of the '641 Patent.  
23 For example, to induce such third parties' and users' infringement, AMP CREATIVE, on  
24 information and belief, provided, sold, or promoted the Accused Products to end-users or other  
25 third parties along with specific instructions or training regarding the use of those products,  
26 which instructions or training actively induced said end-users and other third parties to practice

1 one or more of the Claims and said instructions or training caused direct infringement of such  
2 Claims.

3 47. AMP CREATIVE possessed the specific intent to induce direct infringement of  
4 the Claims by end-users and other third parties which intent was manifested, inter alia, by its  
5 instructions and/or training for using the Accused Products to end users and third parties, and  
6 sale of the Accused Products to end users and third parties, and its knowledge of the '641 Patent  
7 and its knowledge that any use of the Accused Products by end-users and other third parties  
8 would necessarily directly infringe one or more of the claims of the '641 Patent.

9 48. AMP CREATIVE knew or should have known that testing, demonstrating,  
10 marketing, making, using, offering to sell, selling, and/or importing the Accused Products  
11 constituted infringement of one or more of the claims of the '641 Patent, based on, among other  
12 things, the reasons alleged in the foregoing paragraph.

13 49. By reason of the acts of AMP CREATIVE alleged herein, ESPi has suffered  
14 damage in an amount to be proved at trial.

15 **FIFTH CLAIM FOR RELIEF**

16 **(Direct Infringement of the '540 Patent in Violation of 35 U.S.C. § 271(a))**

17 50. ESPi refers to and incorporates herein by reference paragraphs 1-49.

18 51. The '540 Patent is valid and enforceable.

19 52. AMP CREATIVE has infringed and continues to infringe at least Claims 2, 11-  
20 19, 25, 32, 33, 34, 36, 37, 39, 40, and 44-49 of the '540 Patent under 35 U.S.C. 271(a), either  
21 literally or under the Doctrine of Equivalents, by making, using, selling or offering to sell the  
22 Accused Products.

23 53. AMP CREATIVE has had knowledge and notice of the '540 Patent, as well as of  
24 its own infringement of the '540 Patent, since at least the date of the filing of this Complaint.

25 54. ESPi has been and continues to be damaged by AMP CREATIVE's infringement  
26 of the '540 Patent.

1           55.     AMP CREATIVE's infringement of the '540 Patent has been and continues to be  
2 willful.

3                                   **SIXTH CLAIM FOR RELIEF**

4                   **(Inducing Infringement of the '641 Patent, in Violation of 35 U.S.C. § 271(b))**

5           56.     ESPi refers to and incorporates herein by reference paragraphs 1-55.

6           57.     AMP CREATIVE is also liable for indirect infringement under 35 U.S.C.  
7 §271(b), because AMP CREATIVE knowingly induced and continues to induce the direct  
8 infringement of one or more of the Claims by end-users and other third parties (i.e. wholesalers,  
9 retailers, entertainment operators, e-sports venues and arcade operators) in the United States.

10          58.     Said-users and other third parties have directly infringed at least Claims 2, 11-19,  
11 25, 32, 33, 34, 36, 37, 39, 40, and 44-49 of the '540 Patent by using or operating the Accused  
12 Products, in the manner for which such Accused Products were and are designed and marketed;  
13 that is when the Accused Products are used as AMP CREATIVE intends them to be used, the  
14 user and the act of usage thereof necessarily directly infringe the '540 Patent.

15          59.     AMP CREATIVE knowingly took active steps to induce end-users and other third  
16 parties in the United States to engage in direct infringement of the '540 Patent since AMP  
17 CREATIVE knew that when the Accused Products are used for their intended purpose by third  
18 parties and end users, such third parties and users directly infringe the claims of the '540 Patent.  
19 For example, to induce such third parties' and users' infringement, AMP CREATIVE, on  
20 information and belief, provided, sold, or promoted the Accused Products to end-users or other  
21 third parties along with specific instructions or training regarding the use of those products,  
22 which instructions or training actively induced said end-users and other third parties to practice  
23 one or more of the Claims and said instructions or training caused direct infringement of such  
24 Claims.

25          60.     AMP CREATIVE possessed the specific intent to induce direct infringement of  
26 the Claims by end-users and other third parties which intent was manifested, inter alia, by its

1 instructions and/or training for using the Accused Products to end users and third parties, and  
2 sale of the Accused Products to end users and third parties, and its knowledge of the '540 Patent  
3 and its knowledge that any use of the Accused Products by end-users and other third parties  
4 would necessarily directly infringe one or more of the claims of the '540 Patent.

5 61. AMP CREATIVE knew or should have known that testing, demonstrating,  
6 marketing, making, using, offering to sell, selling, and/or importing the Accused Products  
7 constituted infringement of one or more of the claims of the '540 Patent, based on, among other  
8 things, the reasons alleged in the foregoing paragraph.

9 62. By reason of the acts of AMP CREATIVE alleged herein, ESPi has suffered  
10 damage in an amount to be proved at trial.

11  
12  
13 **PRAYER FOR RELIEF**

14 WHEREFORE, ESPi prays for relief as follows:

15 A. Judgment that AMP CREATIVE has directly infringed, and induced others to  
16 infringe, the '559 Patent either literally and/or under the doctrine of equivalents;

17 B. Judgment that AMP CREATIVE has directly infringed, and induced others to  
18 infringe, the '641 Patent either literally and/or under the doctrine of equivalents;

19 C. Judgment that AMP CREATIVE has directly infringed, and induced others to  
20 infringe, the '540 Patent either literally and/or under the doctrine of equivalents;

21 D. Judgment awarding ESPi general and/or specific damages, including a reasonable  
22 royalty and/or lost profits, in amounts to be fixed by the Court in accordance with proof,  
23 including enhanced and/or exemplary damages, as appropriate, as well as all of AMP  
24 CREATIVE's profits or gains of any kind from its acts of patent infringement.

1 E. Judgment awarding ESPi all of its costs, including its attorneys' fees, incurred in  
2 prosecuting this action, including, without limitation, pursuant to 35 U.S.C. § 285 and other  
3 applicable law;

4 F. Judgment awarding ESPi pre-judgment and post-judgment interest; and

5 G. Judgment awarding ESPi such other and further relief as the Court may deem just  
6 and proper.

7  
8 **JURY DEMAND**

9 Pursuant to Federal Rule of Civil Procedure 38(b), ESPi hereby demands a trial by jury  
10 on all issues triable to a jury.

11 Dated: February 25, 2025

12 Respectfully submitted,

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